

# Utilities and Transportation Commission

## Standard Inspection Report for Intrastate Hazardous Liquid Systems

### Records Review and Field Inspection

S – Satisfactory    U – Unsatisfactory    N/A – Not Applicable    N/C – Not Checked  
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

A completed **Inspection Checklist, Cover Letter and Field Report, IMP and OQ Field Validation Forms** are to be submitted to the Chief Engineer within **30 days** from completion of the inspection.

Inspection Report			
<b>Inspection ID/ Docket Number</b>	2659		
<b>Inspector Name &amp; Submit Date</b>	Dave Cullom    November 12, 2013		
<b>Chief Engineer Name &amp; Review Date</b>	Joe Subsits, 11/15/2013		
Operator Information			
<b>Name of Operator:</b>	BP Pipeline (North America)	<b>OPID #:</b>	31189
<b>Name of Unit(s):</b>	BP Cherry Point		
<b>Records Location:</b>	Bellingham (rented/leased space)		
<b>Date(s) of Last Review:</b>	March 15 – 17, 2010	<b>Inspection Date(s)</b>	October 28-30, 2013

#### Inspection Summary:

The 24inch crude oil line starts at Lake Terrell Rd and runs to BP Cherry Point Refinery. Kinder Morgan has ANSI 150 series equipment. ANSI 600 series fittings are on The 24 inch line. The butane line operates from Cherry Point Refinery to the Ferndale Terminal with the two breakout tanks operated currently by Chevron.

The field inspections included the pig launcher area for the 24” crude oil line, the 6” butane pig trap inside the Chevron LPG loading terminal, all the rectifiers, CP test stations, casings, and pipeline right-of-way. There were signs for emergency contact telephone numbers and non-smoking on the perimeter fence of the 24” pig launcher station during the field inspection.

There was one item of concern for the non-removable pipe supports used throughout both systems. These make it very difficult, if not impossible, to check for atmospheric corrosion between the supports and the line pipe.

<b>HQ Address:</b>		<b>System/Unit Address:</b>	
150 W. Warrenville Road Naperville, IL 60563		BP Pipeline (North America) Inc. Cherry Point Refinery 4519 Grandview Road Blaine, WA 98231	
<b>Co. Official:</b>	Steve Pankhurst	<b>Phone No.:</b>	(360) 371-1744
<b>Phone No.:</b>	None on file in contacts	<b>Fax No.:</b>	(360) 371-1697
<b>Fax No.:</b>	None on file in contacts	<b>Emergency Phone No.:</b>	(800) 362-6742
<b>Emergency Phone No.:</b>	888-271-8880 (Renton Control Center) 800-548-6482 (Tulsa, OK Control Center)		
<b>Persons Interviewed</b>	<b>Title</b>		<b>Phone No.</b>
James Fraley	Damage Prevention Team Lead		(360) 705-4879
Dennis Johnston	North Area O&M Team Lead		(360) 815-0345
John Newhouse	DOT Compliance Advisor		(630) 536-2549
Jim Bruen	DOT Team Leader		630-536-2536
Charlene Henning	Administrative Assistant		(360) 428-4214 x6005
Kelli Gustaf	Environmental Coordinator		(425) 235-7743
Ross Degerstedt	Corrosion Lead		(425) 981-2532

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**UTC staff conducted abbreviated procedures inspection on 195 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.**

(check one below and enter appropriate date)

Team inspection was performed (Within the past five years.) or,	Date:	
Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	March 15 – 17, 2010

PART 199 DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES		S	U	NA	NC
Subparts A - C	Drug & Alcohol Testing & Misuse Prevention Program – Use PHMSA Form #13, Rev 3/19/2010. Do not ask the company to have a drug and alcohol expert available for this portion of your inspection.	X			

Comments:

RECORDS REVIEW			S	U	NA	NC
CONVERSION TO SERVICE						
1.	195.5(a)(2)	All aboveground segments of the pipeline, and appropriately selected underground segments must be visually inspected for physical defects and operating conditions which reasonably could be expected to impair the strength or tightness of the pipeline.			X	
2.	195.5(c)	Pipeline Records (Life of System)			X	
3.		Pipeline Investigations			X	
4.		Pipeline Testing			X	
5.		Pipeline Repairs			X	
6.		Pipeline Replacements			X	
7.		Pipeline Alterations			X	
REGULATED RURAL GATHERING LINES			S	U	NA	NC
8.	195.11(a)	Operator has identified pipelines that are Regulated Rural Gathering Lines that meet all of the following criteria: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (1) nominal diameter from 6 5/8 inches to 8 5/8 inches; (2) located in or within one-quarter mile of a USA (3) operates at an MOP established under §195.406 that is: (i) greater than 20% SMYS; or (ii) if the stress level is unknown, or not steel; > 125 psig.			X	
9.	195.11(b)	Operator has prepared written procedures to carry out the requirements of <b>195.11</b> . (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). <ul style="list-style-type: none"> <li>• Subpart B Reporting</li> <li>• Corrosion Control</li> <li>• Damage Prevention</li> <li>• Public Awareness</li> <li>• Establish MAOP</li> <li>• Line Markers</li> <li>• Operator Qualification</li> </ul>			X	
10.	195.11(c)	If a new USA is identified after July 3, 2008, the operator must implement the requirements in paragraphs (b)(2 - 8), and (b)(11) for affected pipelines within 6 months of identification. For steel pipelines, comply with the deadlines in paragraphs (b)(9 & 10).			X	

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11.	195.11(d)	<p>Operator must maintain: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08).</p> <p>(1) Segment identification records required in paragraph (b)(1) of this section and the records required to comply with (b)(10) of this section, for the life of the pipe.</p> <p>(2) Records necessary to demonstrate compliance (b)(2 – 9 &amp; 11) of this section according to the record retention requirements of the referenced section or subpart.</p>			X	
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**Comments:**

**1-11 \*\*\*Notes – There has been no conversion to service or regulated rural gathering lines\*\*\*\***

LOW-STRESS PIPELINES IN RURAL AREA			S	U	NA	NC
12.	195.12(a)	<p>Operator has identified pipelines that are Regulated Low-stress Pipelines in Rural Areas that meet all of the following criteria: (except for those already covered by 49 CFR 195) (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08).</p> <p>(1) nominal diameter of 8 5/8 inches or more;</p> <p>(2) located in or within one-half mile of a USA</p> <p>(3) operates at an MOP established under §195.406 that is:</p> <p style="padding-left: 20px;">(i) greater than 20% SMYS; or</p> <p style="padding-left: 20px;">(ii) if the stress level is unknown, or not steel; &gt; 125 psig.</p>			X	
13.	195.12(b)	<p>Operator has prepared written procedures to carry out the requirements of <b>195.12.</b> (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08).</p> <ul style="list-style-type: none"> <li>• Subpart B Reporting</li> <li>• Establish Integrity Management Plan</li> <li>• All Part 195 Safety Requirements</li> </ul>			X	
14.	195.12 (c)(1)	Operator may notify PHMSA of economic burden. (Amt. Pub. 06/03/08 eff. 07/03/08).			X	
15.	195.12(d)	If, after July 3, 2008, a new USA is identified, the operator must implement the requirements in paragraphs (b)(2)(i) for affected pipelines within 12 months of identification. (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08).			X	
16.	195.12(d)	<p>Operator must maintain: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08).</p> <p>(1) Segment identification records required in paragraph (b)(1) for the life of the pipeline.</p> <p>(2) Records necessary to demonstrate compliance (b)(2 – 4) according to the record retention requirements of the referenced section or subpart.</p>			X	

**Comments:**

**12-16 \*\*\*Notes – There are no low-stress pipelines in rural areas\*\*\*\***

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REPORTING						
17.	49 U.S.C. 60132, Subsection (b) ADB-03-02 ADB-08-07	<b>Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002</b> Do records indicate: NPMS submissions are updated every 12 months if system modifications (excludes distribution lines and gathering lines) occurred, and if no modifications occurred an email to that effect was submitted?	X			
18.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders?	X			
19.	195.48/.49	Complete and submit DOT Form PHMSA F 7000-1.1 for each type of hazardous liquid pipeline facility operated at the end of the previous year for each commodity, and each state a pipeline traverses by June 15 of each calendar year. <b>***Notes – Looked at last annual report and the Annual Report for the state too.***</b>	X			
20.	195.52	Immediate notice to NRC (800) 424-8802, or electronically at <a href="http://www.nrc.uscg.mil">http://www.nrc.uscg.mil</a> , of certain events, and additional report if significant new information becomes available. Operator must have a written procedure for calculating an initial estimate of the amount of product released in an accident. (Amdt. 195-95, 75 FR 72878, November 26, 2010, eff. 1/1/2011). <b>*****Notes - In Procedure P-195.52c*****</b>	X			
21.	195.54(a)	Accident Report - file as soon as practicable, but no later than 30 days after discovery. Submittal must be electronically to <a href="http://portal.phmsa.dot.gov/pipeline">http://portal.phmsa.dot.gov/pipeline</a> (Amdt. 195-95, 75 FR 72878, November 26, 2010). <b>***Notes – No accidents***</b>			X	
22.	195.54 (b)	Supplemental report - required within 30 days of information change/addition (DOT Form 7000-1) <b>***Notes – No accidents***</b>			X	
23.	195.56(a)	SRC Report is required to be filed within five (5) working days of the determination and within ten (10) working days after discovery 195.56(a) (195.55(a)) <b>***Notes – No SRCs have occurred.***</b>			X	
24.	195.56(b)	SRC Report requirements, including corrective actions (taken and planned) <b>***Notes – No SRCs have occurred.***</b>			X	
25.	195.57	Do records indicate reports were submitted within 60 days of completing inspection of underwater pipelines? 195.413(a) (195.57) <b>***Notes – No facilities of this type.***</b>			X	
26.	195.59	Do records indicate reports were filed for abandoned offshore pipeline facilities or abandoned onshore pipeline facilities that crosses over, under or through a commercially navigable waterway? <b>***Notes – No facilities of this type.***</b>			X	
27.	195.64	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at <a href="http://portal.phmsa.dot.gov/pipeline">http://portal.phmsa.dot.gov/pipeline</a> (Amdt. 195-95, 75 FR 72878, Nov.26, 2010, eff. 1/1/2011). <b>*****They did in 2012 – This is a one-time notification*****</b>	X			
28.	480-75-610	Report construction for new pipelines (>100 feet) new pipe 45 days prior to new construction <b>***Notes – No construction has occurred since last inspection.***</b>			X	
29.	480-75-620	Was MOP changed based on hydrotest? Report submitted? <b>***Notes – No changes.***</b>			X	
30.	480-75-630(1)	Telephonic Reports to <b>UTC Pipeline Safety Incident Notification 1-888-321-9144</b> (Within <b>2 hours of discovery</b> ) for events which results in; a) A fatality; (b) Personal injury requiring hospitalization; (c) Fire or explosion not intentionally set by the pipeline company; (d) Spills of five gallons or more of product from the pipeline; (e) Damage to the property of the pipeline company and others of a combined total cost exceeding twenty-five thousand dollars (automobile collisions and other equipment accidents not involving hazardous liquid or hazardous-liquid-handling equipment need not be reported under this rule); (f) A significant occurrence in the judgment of the pipeline company, even though it does not meet the criteria of (a) through (e) of this subsection; (g) The news media reports the occurrence, even though it does not meet the criteria of (a) through (f) of this subsection.			X	

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31.	480-75-630(2)	Written reports to the commission within 30 calendar days of the incident. The report must include the following: a) Name(s) and address(es) of any person or persons injured or killed or whose property was damaged; (b) The extent of injuries and damage; (c) A description of the incident including date, time, and place; (d) A description and maximum operating pressure of the pipeline implicated in the incident and the system operating pressure at the time of the incident; (e) The date and time the pipeline returns to safe operations; and (f) The date, time, and type of any temporary or permanent repair. <b>***Notes – they had a release, but it was 2-3 gallons***</b>			X	
32.	480-75-630(3)	Telephonic notification within twenty-four hours of emergency situations including emergency shutdowns, material defects, or physical damage that impairs the serviceability of the pipeline. <b>***Notes – They were not running when the small release occurred***</b>			X	
33.	480-75-630(4)	<b>Filing Reports of Damage to Hazardous Liquid Pipeline Facilities to the commission. (eff 4/1/2013)</b> (Via the commission's Virtual DIRT system or on-line damage reporting form)				
34.	480-75-630(4)(a)	Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n) <b>***Notes – DIRT reporting is submitted by Tulsa control***</b>	X			
35.	480-75-630(4)(b)	Does the operator report the name, address, and phone number of the person or entity that the company has reason to believe may have caused damage due to excavations conducted without facility locates first being completed? <b>***Notes – No instances***</b>			X	
36.	480-75-630(4)(c)	Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed? <b>Note:</b> Records maintained for two years and made available to the commission upon request. <b>***Notes – No instances***</b>			X	
37.	480-75-630(5)	Does the operator provide the following information to excavators who damage hazardous liquid pipeline facilities?				
38.	480-75-630(5)(a)	• Notification requirements for excavators under RCW 19.122.050(1) <b>***Notes – No instances***</b>			X	
39.	480-75-630(5)(b)	• A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and <b>***Notes – No instances***</b>			X	
40.	480-75-630(5)(c)	• Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee. <b>***Notes – No instances***</b>			X	
41.	480-75-630(6)	<b>Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities...</b> • An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; (630(6)(a)  <b>***Notes – No instances***</b>  • A person intentionally damages or removes marks indicating the location or presence of hazardous liquid pipeline facilities. 630(6)(b)			X	

Comments:

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CONSTRUCTION			S	U	NA	NC
42.	195.204	Construction Training/Qualification records including personnel who conduct visual inspections (e.g. inspectors of welds)			X	
43.	195.214(b)	Detailed Test Results to Qualify Welding Procedures and Qualifying tests			X	
44.	195.222(a)	Welders must be qualified in accordance with <b>Section 6 of API Standard 1104 (20<sup>th</sup> edition 2005, including errata/addendum 7/2007 and errata 2 12/2008)</b> or <b>Section IX of the ASME Boiler and Pressure Vessel Code (2007 edition, July 1, 2007)</b> , except that a welder qualified under an earlier edition than currently listed in <b>195.3</b> may weld, but may not requalify under that earlier edition. (Amdt 195-94 Pub. 8/11/10 eff. 10/01/10).			X	
45.	195.222(b)	Welders may not weld with a particular welding process unless, within the preceding 6 calendar months, the welder has (1) Engaged in welding with that process; and (2) Had one weld tested and found acceptable under Section 9 of API 1104.			X	
46.	195.226(a)	Arc burns must be repaired.			X	
47.	195.226(b)	If a notch is not repairable by grinding, a cylinder of the pipe containing the entire notch must be removed. Do arc burn repair procedures require verification of the removal of the metallurgical notch by nondestructive testing? ( <b>Ammonium Persulfate</b> ).			X	
48.	195.226(c)	The ground wire may not be welded to the pipe/fitting being welded.			X	
49.	195.228/.234	Do procedures require welds to be nondestructively tested to ensure their acceptability according to <b>API 1104</b> and as per <b>195.228(b)</b> and per the requirements of <b>195.234</b> in regard to the number of welds to be tested?			X	
50.	195.234(b)	Nondestructive testing of welds performed: (1) In accordance with written procedures for <b>NDT</b> (2) By qualified personnel (3) By a process that will indicate any defects that may affect the integrity of the weld			X	
51.	195.234(d) 195.266(a)	Do records demonstrate at least 10% of all welds that are made by each welder during each welding day are nondestructively tested over the entire circumference of the welds or that more welds are tested per the operator's own procedures?			X	
52.	195.234(e) 195.266(a)	Do records demonstrate all girth welds installed each day in selected locations specified in §195.234(e) are nondestructively tested over their entire circumference?			X	
53.	195.234(f) 195.266(a)	Do records demonstrate that when installing used pipe, 100% of the old girth welds are nondestructively tested?			X	
54.	195.234(g) 195.266(a)	Do records demonstrate 100% of the girth welds have been nondestructively tested at selected pipe tie-ins?			X	
55.	195.266	Construction Records maintained for life of pipeline				
56.	195.266(b)	Amount, Location, Cover of each Size of Pipe Installed			X	
57.	195.266(c)	Location of each Crossing with another Pipeline			X	
58.	195.266(d)	Location of each buried Utility Crossing			X	
59.	195.266(e)	Location of Overhead Crossings			X	
60.	195.266(f)	Location of each Valve and Test Station			X	
PRESSURE TESTING			S	U	NA	NC
61.	195.302(a)	Pipelines, and each pipeline segment that has been relocated, replaced, or otherwise changed, must be pressure tested without leakage (see .302(b), .303, and .305(b) for exceptions).			X	

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62.	195.302(b)/ .302(c)	<p>Except for lines converted under <b>§195.5</b>, the following pipelines <i>may</i> be operated without having been pressure tested per Subpart E and without having established MOP under <b>195.406(a)(5)</b> [80% of the 4 hour documented test pressure, or 80% of the 4 hour documented operating pressure].</p> <ul style="list-style-type: none"> <li>- .302(b)(2)(ii): Any carbon dioxide pipeline constructed before July 12, 1991, that is located in a rural area as part of a production field distribution system.</li> <li>- .302(b)(3): Any low-stress pipeline constructed before August 11, 1994, that does not transport HVL.</li> <li>- .302(b)(4)/.303: Those portions of older hazardous liquid and carbon dioxide pipelines for which an operator has elected the risk-based alternative under §195.303 and which are not required to be tested based on the risk-based criteria.</li> </ul> <p><i>Note: (An operator that elected to follow a risk-based alternative must have developed plans that included the method of testing and a schedule for the testing by December 7, 1998. The compliance deadlines for completion of testing are as shown in the table in §195.303, and in no case was testing to be completed later than 12/07/2004).</i></p>				
63.		Have all pipelines <u>other than those described above</u> been pressure tested per Subpart E?			X	
64.		If pipelines <u>other than those described above</u> have not been pressure tested per Subpart E, has MOP been established under <b>195.406(a)(5)</b> , in accordance with <b>.302(c)</b> ?			X	
65.	195.304	Test pressure must be maintained for at least 4 continuous hours at a pressure equal to 125 percent, or more, of the MOP. If not visually inspected during the test, at least an additional 4 hours at 110 percent of MOP is required.			X	
66.	195.305(a)	<p>All pipe, all attached fittings, including components, must be pressure tested in accordance with <b>195.302</b>.</p> <p><b>Note:</b> A component, other than pipe, that is the only item being replaced or added to the pipeline system need not be hydrostatically tested under paragraph (a) of this section if the manufacturer certifies that either: (1) The component was hydrostatically tested at the factory; or (2) The component was manufactured under a quality control system that ensures each component is at least equal in strength to a prototype that was hydrostatically tested at the factory.</p>			X	
67.	195.305(b)	Manufacturer testing of components. Records available and adequate?			X	
68.	195.306	Appropriate test medium			X	
69.	195.308	Pipe associated with tie-ins pressure tested?			X	
70.	195.310(a)	Pipeline Test Records for useful life of facilities?			X	
71.	195.310(b)	Do test records required by paragraph (a) include				
72.	195.310(b)(1)	Pressure recording charts			X	
73.	195.310(b)(2)	Test instrument calibration records			X	
74.	195.310(b)(3)	Name of operator, person responsible, test company used, if any			X	
75.	195.310(b)(4)	Date and time of test			X	
76.	195.310(b)(5)	Minimum test pressure			X	
77.	195.310(b)(6)	Test medium			X	
78.	195.310(b)(7)	Description of the facility tested and the apparatus			X	
79.	195.310(b)(8)	Explanation of any pressure discontinuities, including test failures that appear on the pressure recording charts.			X	
80.	195.310(b)(9)	Where elevation differences in the test section exceed <b>100 feet</b> , a profile of the elevation over the entire length of the test section must be included			X	
81.	195.310(b)(10)	Temperature of the test medium or pipe during the test period			X	

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**Comments:**

\*\*\*42-81 Notes – No construction has occurred since last inspection.\*\*\*

INTERNAL DESIGN PRESSURE PROCEDURES		S	U	NA	NC
.402(c)/.422	Internal design pressure for pipe in a pipeline is determined in accordance with the requirements of this section and the formula: $P = (2 \text{ St/D}) \times E \times F$ . <b>.106 *****Notes – Procedure p 195.406 Refs STP-43-202***</b>	X			

OPERATION & MAINTENANCE			S	U	NA	NC
82.	195.402(a)	Annual Review of O&M Manual (1 per yr/15 months) *****Notes – Books 1 and 2 (2 is site specific to the butane and crude line. These were reviewed for the last three years)***	X			
83.		Appropriate parts must be kept at locations where O&M activities are conducted *****Notes – It is in the electronic DRM system****	X			
84.	195.402(c)(4)	Determination of Areas requiring immediate response for Failures or Malfunctions*****Notes – All areas along the pipeline would require immediate response. The HCA maps looked very good.***	X			
85.	195.402(c)(5)	Pipeline accidents analyzed to determine their causes *****Notes – The spill/leak with have an RCA to be shared with the UTC****	X			
86.	195.402(c)(10)	Abandoning pipeline facilities, including safe disconnection from an operating pipeline system, purging of combustibles, and sealing abandoned environmental hazards.  Reporting abandoned pipeline facilities offshore, or onshore crossing commercially navigable waterways per 195.59 *****Notes – No facilities have been abandoned.***			X	
87.	195.402(c)(12)	Establishment/Maintaining liaison with Fire, Police, and other Public Officials	X			
88.	195.402(c)(13)	Periodic review of personnel work – effectiveness of normal O&M procedures and corrective action when deficiencies are found *****Notes – This is done as part of the “OMER” review. Looked at the last three years for that as well****	X			
89.	195.402(c)(15)	Implementing the applicable control room management procedures required by 195.446. (Amdt. 195-93, 74 FR 63310, December 3, 2009, eff. 2/1/2010). *****Notes – This is addresseed in the CRM audits***	X			
90.	195.402(e)(1)	Records that indicate receiving, identifying, classifying and communicating notices of events requiring immediate response in accordance with procedures. *****Notes – This is contained in the “field document” for incident reporting*****	X			
91.	195.402(e)(2)	Prompt and effective response to each type of emergency <b>Note:</b> Review operator records of previous accidents and failures including third-party damage and leak response *****Notes – The release of crude from the 24 inch valve was used as an example****	X			
92.	195.402(e)(7)	Records indicating that notifications were made to fire, police, and other appropriate public officials of hazardous liquid emergencies and were coordinated with preplanned and actual responses (including additional precautions necessary for an emergency involving HVLs)? *****Notes – The release of crude from the 24 inch valve was used as an example****	X			
93.	195.402(e)(9)	Post accident review of employees’ activities to determine if procedures were effective and corrective action was taken?	X			
94.	195.402(e)(10)	Actions to be taken by a controller during an emergency in accordance with 195.446. (Amdt. 195-93, 74 FR 63310, December 3, 2009, eff. 2/1/2010). *****Notes – Tulsa control initiates notice and Kelli Gustaf calls the NRC*****	X			

# Utilities and Transportation Commission

## Standard Inspection Report for Intrastate Hazardous Liquid Systems

### Records Review and Field Inspection

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95.	195.403(a)	Records of operator provided training to its emergency response personnel as required. - **Notes – ICS training and Hazwoper refresher each year. They do a debrief of every event. We looked at 7/20/2011, 10/10/2013, 8/20/2013*****	X			
96.	195.403(b)(1)	Annual review with personnel on performance in meeting the objectives of the emergency response training program (1 per yr/15 months) *****Notes – Review employee actions as part of debrief. Some items include need more training. i.e More training was noted as part of the notification process. *****	X			
97.	195.403(b)(2)	Make appropriate changes to the emergency response training program (1 per yr/15 months) *****Notes – Kelli Gustaf sends letters to the UTC, PHMSA, Ecology.*****	X			

**Comments:**

OPERATION & MAINTENANCE (Cont)			S	U	NA	NC
98.	195.403(c)	Verification of supervisor knowledge of emergency response procedures (1 per yr/15 months) *****Notes – Dennis J participates as part of the drill. This year they did a gasoline release. He does all the drills where he is critiqued. *****	X			
99.	195.404(a)(1)	Maps and Records of the following facilities maintained and made available: i. Breakout tanks ii. Pump stations iii. Scraper and sphere facilities iv. Pipeline valves v. Facilities to which 195.402(c)(9) applies vi. Rights-of-way vii. Safety devices to which 195.428 applies	X			
100.	195.404(a)(2)	All crossings of public roads, railroads, rivers, buried utilities and foreign pipelines.	X			
101.	195.404(a)(3)	The maximum operating pressure of each pipeline in accordance with 195.406	X			
102.	195.404(a)(4)	The diameter, grade, type, and nominal wall thickness of all pipe.	X			
103.	195.404(b)(2) 195.402(d)(1)	Response to any emergency or abnormal operations applicable under 195.402 (maintained for at least 3yrs) as required by written procedures. *****Looked at alarms from 2010 to 2013***	X			
104.	195.404(b) 195.402(d)(5)	Periodic review of personnel work – effectiveness of abnormal operation procedures/corrective action taken when deficiencies found *****Notes – Looked at F195.402d5 and Dennis F Johnston did this on 10/24/2013*****	X			
105.	195.404(c)(1)	The date, location, and description of each repair made on the pipe and maintain it for the life of the pipe. *****Notes – No repairs in the last three years.*****	X			
106.	195.404(c)(2)	The date, location, and description of each repair made to parts of the pipeline system other than the pipe and maintain it for at least 1 year. *****Notes – Looked at this sheet as well*****	X			
107.	195.404(c)(3)	Each inspection and test required by Subpart F shall be maintained for at least 2 years, or until the next inspection or test is performed, whichever is longer.	X			
108.	195.406(a)/ .406(a)(1)	Except for surge pressures and other variations from normal operations, no operator shall operate a pipeline above the MOP, and the MOP may not exceed any of the following; • The internal design pressure of the pipe determined by 195.106.*****Notes – They cannot given design limitations on KM pipeline. The butane line is limited by pumps on the BP Cherry Point Refinery and the Chevron Terminal. ***	X			
109.	480-75-620	Change in MOP? Changed based on hydrotest? ***Notes – None based on a new hydrotest*****			X	
110.	195.408(b)	Records indicating emergency communication system(s) use was as required ***Notes – At the valve release event we looked at records detailing communication*****	X			

**Utilities and Transportation Commission**  
**Standard Inspection Report for Intrastate Hazardous Liquid Systems**  
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111.	195.412(a)	Operator must inspect the right-of-way at intervals not exceeding <b>3 weeks</b> , but at least <b>26 times each calendar year</b> ****Notes – Looked at 2010 – 2013****	X			
112.	195.412(b)	Records indicating ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed ****Notes the ROW is patrolled, but they have no navigable waterways they cross****			X	
113.	480-75-640	Depth of cover surveys and mitigation ****Notes – They walk the ROW and clear it of brush every year. The depth of cover they did in 2012 and sampled ~100ft****	X			
114.	195.420(b)	Mainline valves inspected to determine that it is functioning properly at intervals not exceeding <b>7½ months</b> , but at least <b>twice</b> each calendar year. ****Notes – Checked the last three years for both pipelines.****	X			
115.	480-75-500	Pipe movement study per API 1117 ****Notes – They have a procedure, but no instances of movement****			X	
116.	195.428(a)	Insp. of overpressure safety devices ( <b>1 per yr/15 months</b> non-HVL; <b>2 per yr/7½ months</b> HVL) ****Notes – Safety devices checked back to 2010 – both systems met required intervals.****	X			
117.	195.428(b)	Inspection of Relief Devices on HVL Tanks (intervals NTE <b>5 yrs</b> ). ****Notes – No facilities of this type.****			X	
118.	195.428(c)	Above ground breakout tanks that are constructed or significantly altered according to API Standard 2510 after October 2, 2000, must have an overfill protection system installed according to section 5.1.2 of API Standard 2510. Amt. 195-86 Pub. 06/09/06 eff. 07/10/06.  Tanks over 600 gallons (2271 liters) constructed or significantly altered after October 2, 2000, must have overfill protection according to API Recommended Practice 2350 unless operator noted in procedures manual (195.402) why compliance with API RP 2350 is not necessary for the safety of a particular breakout tank. ****Notes – No facilities of this type.****			X	
119.	195.428(d)	Inspection of Overfill Systems ( <b>1 per yr/15 months</b> non-HVL; <b>2 per yr/7½ months</b> HVL) ****Notes – No facilities of this type.****			X	
120.	480-75-300 (3)	Leak detection and alarm records ****Notes – The AOC alarm log was provided. It includes leak detection capabilities.****	X			
121.	480-75-320	Surge analysis done? *****Notes- Not completed***** Done in 2005 (Butane) and the crude line was done in Dec 2007 using the Stoner pipeline simulator.	X			
122.	195.430	Inspection of Fire Fighting Equipment	X			
123.	195.432(c)	<b>Breakout Tanks:</b> Inspect the physical integrity of in-service steel aboveground breakout tanks built to <b>API Standard 2510</b> according to <b>Section 6 of API 510</b> . Amt. 195-86 Pub. 06/09/06 eff 07/10/06. <b>Note: For Break-out tank unit inspection, refer to Breakout Tank Form</b> ****Notes – No facilities of this type.****			X	

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	PUBLIC AWARENESS PROGRAM PROCEDURES (In accordance with API RP 1162)		S	U	NA	NC
124.	195.440 (e & f)	<b>PUBLIC AWARENESS PROGRAM</b>	X			
Documentation properly and adequately reflects implementation of operator’s Public Awareness Program requirements – Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc), See table below.						
Operators in existence on June 20, 2005, must have completed their written program no later than June 20, 2006						
<b>API RP 1162 Baseline* Recommended Message Delivery Frequencies</b>						
<b>Stakeholder Audience (Hazardous Liquid Operators)</b>		<b>Baseline Message Frequency (Starting from Effective Date of Plan)</b>				
Residence along right-of-way and Places of Congregation		2 Years 2011 was done No records				
Emergency Officials		Annual – Looked at 2011,				
Public Officials		3 Years - They do it every year.				
Excavator and Contractors		Annual – 2010 Excavator brochure was looked at. Also in 2012 a mailing was sent and to public officials and excavators.				
One-Call Centers		As required of one-call center				
* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, record keeping, program evaluation, etc.						
125.		.440(g)				
126.	.440(i)	Records indicating that the continuing public education program evaluation process has been implemented and do records indicate that continuous improvement is being implemented. *****Notes - Each year the damage prevention coordinators from BP get together and see what is needed to change their programs.*****	X			

**Comments:** Notes – Dennis Johnston is on the LEPC for Whatcom County.

Mailing portion done by Paradigm. School program are done 1/3 each year. Need 2010 Ferndale July 2011 In June and July 2011 the schools were mailed as part of the supplemental program. Homeowners in 2010 were sent mailings.

DAMAGE PREVENTION PROGRAM			S	U	NA	NC
127.	195.442(a)	Records indicating the damage prevention program is being carried out as written	X			
128.	195.442(c)(1)	List of Current Excavators ****Notes – Paradigm mails to all excavators within Whatcom County including the permitted excavators****	X			
129.	195.442(c)(2)	Notification of Public/Excavators	X			
130.	195.442(c)(3)	Notifications of planned excavations. (One -Call Records) ***Locates are done by BP employees. We checked several tickets***	X			
131.	195.442(c)(4)	If the operator has buried pipelines in the area of excavation activity, provide for actual notification of persons who give notice of their intent to excavate of the type of temporary marking to be provided and how to identify the markings.	X			
132.	195.442(c)(5)	Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.	X			

# Utilities and Transportation Commission

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133.	195.442(c)(6)	Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:				
134.		1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline? <b>****Notes – Not in this inspection time period****</b>			X	
135.		2. In the case of blasting, does the inspection include leakage surveys? (required) <b>***Notes – No blasting in this unit in this inspection time frame****</b>			X	
136.		Does the operator review records of accidents and failures due to excavation damage to ensure causes of failures are addressed to minimize the possibility of reoccurrence? <b>***Notes –None in this inspection time frame****</b>			X	
137.	<b>OPERATOR QUALIFICATION</b>					
138.	195.507(a) .507(b)	Are personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements?	X			
139.	195.507(a) .507(b)	Are qualification records available for contractor personnel that contain the required elements? <b>****Notes – The work in this unit for this inspection time period was performed by BP employees.****</b>			X	

**Comments:**

CPM SYSTEMS			S	U	NA	NC
140.	195.444	Each CPM system employed on a pipeline segment should be fully described and the documentation readily available for reference by the users and by those employees responsible for the maintenance and support of the CPM system				
141.		a. General Information (this information is usually available as a part of normal Control Center information). b. A system map, profile and detailed physical description for each pipeline segment. <b>***Notes – The map has flow and pressure for each system*****</b> c. A summary of the characteristics of each product transported.  <b>****Notes - Each discreet document describe the commodity transported.****</b>	X			
142.		CPM Specific Information: <b>***Notes – Both systems use “ATMOS Pipe”</b>				
143.	195.444	a. A tabulation of the inputs used in the CPM procedure for each pipeline segment. <b>***Notes – They have pressure, temp, and flow inputs at each end.****</b> b. A general description of the CPM outlining its principles of operation. <b>***Notes – These documents contain detailed hardware, software, and algorithms***</b> c. A list of special considerations or step-by-step procedures to be used in evaluating CPM results and for requesting assistance with alarm evaluation, e.g., on-call support phone numbers where this systems is implemented. <b>***Notes – We looked a controller training document that helps the controller evaluate output alarms.****</b>	X			
144.		d. Details of the expected performance of the leak detection system under normal and line upset conditions; and the effects of system degradation on the leak detection results. e. CPM pipeline controller training manuals or information. f. CPM alarm thresholds for the various applications.  <b>***Notes – ATMOS will know if it is shut-in state, but the performance in this state is unknown***</b>	X			

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Comments: The system is capable of 5% in 15 min (August 24, 2011) Looked at API 1130 Reference in OMER Procedure P-195.444

CORROSION CONTROL			S	U	NA	NC
145.	195.589(c) 195.555	Supervisors maintain thorough knowledge of corrosion procedures.	X			
146.	195.589(c) 195.567(c)	Test lead maintenance / Frequent enough intervals ****Notes – ROW crews can note bad TLs.*****	X			
147.	480-75-510	Corrosion remediation within 90 days	X			
148.	195.589(c) 195.569	Inspection of Exposed Buried Pipelines (External Corrosion) ****Notes – No exposures have occurred during this inspection time period****			X	
149.	195.589(c) 195.573(a)(1)	External Corrosion Control, Protected Pipelines Annual CP tests (1 per yr/15 months) ****Notes - Looked at 2011-2013 records****	X			
150.	195.589(c) 195.573(a)(2)	Close Interval Surveys - when circumstances dictated a need for surveys, dates of completed surveys, data from completed surveys and analysis of completed surveys? ****Notes – In 2007 both lines were done*****	X			
151.	195.589(c) 195.573(b)(1) & (2)	External Corrosion Control, Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/NTE 39 months) ****Notes – No facilities have these issues.****			X	
152.	195.589(c) 195.573(c)	Interference Bonds, reverse current switches, diodes, rectifiers ****Notes – They have non-critical bonds only and looked at the last three years.****	X			
153.	195.589(c) 195.573(e)	Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?	X			
154.	195.589(c) 195.575(a-d)	Electrical isolation inspection, testing and monitoring (if applicable) ****Notes – Testing for casings as well on the form 2011-2013****	X			
155.	195.589(c) 195.577(a)	Testing for Interference Currents ****Notes – Several test stations are in to check CNG, BP product lines and Kinder Morgan's lines****	X			
156.	195.589(c) 195.579(a)	Corrosive effects investigation ****Notes – no concerns after the ILI run except some pig launcher concerns****			X	
157.	195.589(c) 195.579(b)	Examination of Coupons/Other Types of Internal Corrosion Monitoring Equipment (2 per yr/NTE 7½ months) ****Notes – They monitor the product quality and check the ILI runs as well. They use cleaning pigs quarterly****			X	
158.	195.589(c) 195.579(b)(1-3)	Corrosion inhibitors used in sufficient quantities ****Notes – None used by BP****			X	
159.	195.589(c) 195.579(a)(c)	Inspection of Removed Pipe for Internal Corrosion ****Notes – No removals have occurred during this inspection time period****			X	
160.	195.589(c) 195.583(a-c)	Atmos. Corr. Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) m ****Notes - This was done in Sept/Oct 2013.****	X			
161.	195.589(c) 195.585(a)	General Corrosion – Reduce MOP or repair ; ASME B31G or RSTRENG ****Notes – No instances***			X	
162.	195.585(b)	Localized Corrosion Pitting – replace, repair, reduce MOP ****Notes – None****			X	
163.	195.589(a)&(b) 195.563(a)	Cathodic Protection Do records document when cathodic protection was operational on constructed, relocated, replaced, or otherwise changed pipelines within the last 5 years? (Maps showing anode location, test stations, CP systems, protected pipelines, etc.) ****Notes – No outages****			X	

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<b>Comments:</b>
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FIELD REVIEW			S	U	N/A	N/C
164.	195.262(a)	Has adequate ventilation been provided at pump station buildings? <b>***Notes – There are no pumping stations***</b>			X	
165.	195.262(a)	Have warning devices that warn of the presence of hazardous vapors been installed at new pump station buildings? <b>***Notes – There are no pumping stations***</b>			X	
166.	195.262(b)	Has a device for activating emergency shutdown of the pump station been installed? <b>***Notes – There are no pumping stations***</b>			X	
167.	195.262(b)	If power is needed to actuate safety devices, has an auxiliary power supply been provided? <b>***Notes – There were no power operated safety devices observed during this inspection***</b>			X	
168.	195.262(b)	Have safety devices been installed to prevent over-pressuring new or modified pumping equipment? <b>***Notes – There are no pumping stations***</b>			X	
169.	195.262(d)	Has on-shore pumping equipment been installed on property under the control of the operator and is that equipment at least 50 feet from the boundary of that property? <b>***Notes – There are no pumping stations***</b>			X	
170.	195.262(e)	Has motive power, separate from pump station power, been provided for that fire protection equipment that incorporates pumps? <b>***Notes – There are no pumping stations***</b>			X	
171.	195.302	Is pressure testing being adequately conducted? (.304, .305, .306, .307) <b>**Notes – No pressure testing was being conducted during this inspection***</b>			X	
172.	195.308	Pre-pressure Testing Pipe - Marking and Inventory <b>***Notes – None***</b>			X	
173.	195.402(c)(13)	Protect of personnel from hazards of unsafe accumulations of vapor or gas, at the excavation site. <b>**Notes – No excavation was being conducted during this inspection***</b>			X	
174.	195.403(c)	Supervisor Knowledge of Emergency Response Procedures	X			
175.	195.410	Are line markers placed and maintained as required? 195.410(a) (195.410(b); 195.410(c); CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)	X			
176.	480-75-540	Markers at exposed areas <b>****Notes - They walk the ROW and after mow they replace the markers after clearing****</b>	X			
177.	195.412	Are the ROW conditions acceptable for the type of patrolling used?	X			
178.	195.420 (a), (b)	Valve Maintenance & Operation	X			
179.	195.420(c)	Valve Protection from Unauthorized Operation and Vandalism	X			
180.	195.426	Are launchers and receivers equipped with relief devices?	X			
181.	195.428(a)	Are inspections of overpressure safety devices adequate (including HVL lines)? <b>****Notes – We asked, but no personnel were available to perform this task during this audit***</b>			X	
182.	195.428(a)	Do pressure control devices installed on HVL pressure breakout tanks appear to be in satisfactory mechanical condition and to be functioning properly? <b>**Notes – No tanks***</b>			X	
183.	195.428(c)	Do selected overfill protection systems on aboveground breakout tanks that were constructed or significantly altered after October 2, 2000 function properly and are they in good mechanical condition? [Note: This question applies to both non-HVL and HVL pressure breakout tanks.] <b>**Notes – No tanks***</b>			X	
184.	480-75-320	Relief Device set at or below MOP	X			

<b>Comments:</b>
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<b>Comments:</b>
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FIELD REVIEW (Cont)			S	U	N/A	N/C
185.	480-75-300	Leak Detection – 8% in 15 Minutes <b>**Notes – We verified this as part of the records review. We were unable to field verify this scenario.**</b>			X	
186.	480-75-300	Leak detection at flow and no flow conditions <b>**Notes – We verified this as part of the records review. We were unable to field verify this scenario.**</b>			X	
187.	195.430	Has adequate fire protection equipment been installed at pump station/breakout tank areas and is it maintained properly? (195.430(a) (195.430(b); 195.430(c); 195.262(e)) <b>**Notes – We verified this since it was an issue in the last inspection and the extinguishers were present and maintained annually**</b>	X			
188.	195.432	Breakout Tanks <b>**Notes – No tanks**</b>			X	
189.	480-75-330	Do Breakout Tanks have independent overfill alarms? <b>**Notes – No tanks**</b>			X	
190.	195.434	Are there operator signs around each pumping station, breakout tank area, and other applicable facilities? <b>**Notes – We verified this since it was an issue in the last inspection and the signs were present with current contact information**</b>	X			
191.	195.436	Security - Pumping Stations - Breakout Tanks <b>**Notes – No tanks**</b>			X	
192.	195.438	Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities? <b>**Notes – We verified this since it was an issue in the last inspection and the signs were present. **</b>	X			
193.	195.446(a)	Is the SCADA display representative of the system configuration? 195.404(a) (195.505(f); 195.446(h)) <b>**Notes – No SCADA HMI or control room on site**</b>			X	
194.	195.446(b)	Do operating personnel know the MOP of respective pump stations and associated alarm settings?	X			
195.	195.446(h)	Do controllers demonstrate adequate skills and knowledge? 195.505(b) (195.446(g)(2)) <b>**Notes – No control room on site**</b>			X	
196.	195.501-195.509	<b>Important:</b> Per OPS, the OQ Field Inspection Protocol Form 15 shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database located at <a href="http://primis.phmsa.dot.gov/oqdb/home">http://primis.phmsa.dot.gov/oqdb/home</a> <b>Form Completed/Uploaded? Y/N Will upload after Chief Engineer review.</b>				
197.	195.571	Cathodic Protection (test station readings, other locations to ensure adequate CP levels)	X			
198.	195.573	Are rectifiers, interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?	X			
199.	195.575	Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit? 195.575(a) (195.575(b); 195.575(c); 195.575(d))	X			
200.	195.583	Atmospheric corrosion - Exposed pipeline components, (splash zones, water spans, soil/air interface, under thermal insulation, disbanded coatings, <b>pipe supports</b> , deck penetrations, etc.) 195.583(c) (195.581(a)) <b>**Notes – The supports did not have weeping corrosion product, but it is unclear how they check for corrosion, as required, 360 degrees around the pipe.**</b>	X			

<b>Comments:</b>
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**Comments:**

**Recent PHMSA Advisory Bulletins (Last 2 years)**

<u><b>Number</b></u>	<u><b>Date</b></u>	<u><b>Subject</b></u>
ADB-2013-07	July 12, 13	Potential for Damage to Pipeline Facilities Caused by Flooding
ADB-12-10	Dec 5, 12	Using Meaningful Metrics in Conducting Integrity Management Program Evaluations
ADB-12-09	Oct 11, 12	Communication During Emergency Situations
ADB-12-08	Jul 31, 12	Inspection and Protection of Pipeline Facilities After Railway Accidents
ADB -12-06	May 7, 12	Verification of Records Establishing MAOP and MOP.
ADB-12-04	Mar 21, 12	Implementation of the National Registry of Pipeline and Liquefied Natural Gas Operators
ADB -12-03	Mar 6, 12	Notice to Operators of Driscopipe 8000 High Density Polyethylene Pipe of the Potential for Material Degradation

For more PHMSA Advisory Bulletins, go to <http://phmsa.dot.gov/pipeline/regs/advisory-bulletin>